

# US Department of Health and Human Services

## Privacy Impact Assessment

**Date Signed:**

05/06/2026

**OPDIV:**

SAMHSA

**Name:**

Projects for Assistance in Transition from Homelessness (PATH) Data Exchange (PDX)

**PIA Unique Identifier:**

P-9000110-713808

**The subject of this PIA is which of the following?**

Major Application

**Identify the Enterprise Performance Lifecycle Phase of the system.**

Operations and Maintenance

**Is this a FISMA-Reportable system?**

No

**Does the system include a Website or online application available to and for the use of the general public?**

Yes

**Identify the operator.**

Contractor

**Is this a new or existing system?**

New

**Does the system have Security Authorization (SA)?**

Yes

**Indicate the following reason(s) for updating this PIA.****Describe the purpose of the system.**

The Projects for Assistance in Transition from Homelessness (PATH) Data Exchange (PDX) website is the online portal that PATH providers utilize to submit their PATH Annual Report to SAMHSA (Substance Abuse and Mental Health Services Administration). PATH program provider data is submitted to local Homeless Management Information Systems (HMIS) and then PATH providers are able to upload non-identifiable data directly from HMIS into PDX through a comma-separated values (CSV) upload process. State PATH Contacts (SPCs) review these data reports and use them to submit their PATH Annual Report to SAMHSA.

In addition to using PDX to submit PATH Annual Report data, the PDX site can also be used to submit progress reports. These progress reports are not required by SAMHSA. It is up to the SPC whether or not the providers are required to submit progress reports. Those that do, use the reports to review data throughout the year to see the progress of each PATH project in their state or territory.

There is also a reports component where the general public can see the confirmed data from prior years

**Describe the type of information the system will collect, maintain (store), or share.**

The PATH Data Exchange (PDX) collects and stores yearly program performance and budget data in line with Government Performance and Results Act (GPRA), goals, results, and progress requirements. Data is collected through the online completion of PATH Annual Report Form (OMB Control No. 0930-0205, Expires 4/30/2026 ). In addition to the yearly reporting data, the PDX system also collects and stores relevant provider information, user information, (first name, last name, email), authentication (username and password), and authorization logs to facilitate the collection of this information.

The PDX maintains profile information for nearly 460 PATH provider agencies. It also currently maintains approximately 2,200 active user accounts. PDX also contains a resource library accessible to State PATH Contacts and providers. The progress reporting section of the system allows State PATH Contacts and providers to generate state-level and provider-level data reports.

PATH Annual report data is gathered and entered on a monthly, quarterly, or annual basis to complete monthly, quarterly progress reports and annual report requirements. The list of data elements collected annually for each PATH provider are: the total number of persons who received any PATH funded service during the current reporting period, the total number of persons contacted this reporting period, number of instances of contact, active clients who became enrolled this reporting period, the total number of services provided during this reporting time period, the total number of referrals given during this reporting time period, number of people enrolled by sex, age, and ethnicity, Veterans, with co-occurring disorders, in emergency various types of housing, amount of federal PATH funds and state subsidies received during the reporting year, number of staff in the provider organizations, number of full-time equivalent (FTE) of staff supported by PATH and matching funds, type of provider organization.

Data in PDX is stored throughout the life of the grant program.

**Provide an overview of the system and describe the information it will collect, maintain (store), or share, either permanently or temporarily.**

The PATH Data Exchange (PDX) is a web-based system used by PATH providers and SPC to collect, review, and submit program data to SAMHSA. This system enables users to complete required annual reports, submit optional progress updates, and access summarized data from prior reporting years.

PDX collects two main types of information: information about system users (limited personally identifiable information (PII)) and program data related to PATH services. Users information includes name, email, username, and password, and is used to manage accounts, enable secure system access, track activity through audit and authorization logs, and support communication. This information is accessible only to users with authenticated system accounts.

Program data is submitted by providers, often through uploads from Homeless Management Information Systems (HMIS), and does not include direct identifiers. It consists of aggregated information such as individuals served, services provided, demographic characteristics, housing status, staffing, and funding.

This data is used to track program performance, support oversight, and meet federal reporting requirements under the GPRA. Data in PDX is stored throughout the life of the grant program.

**Does the system collect, maintain, use or share PII?**

Yes

**Indicate the type of PII that the system will collect or maintain.**

Name

E-Mail Address

Phone Numbers

Authentication Purposes: User Credentials

Program performance and budget data

Facilitation of data collection: Authorization logs

For Annual Report Processes: The list of data elements collected annually for each PATH provider are: the total number of persons who received any PATH funded service during the current reporting period, the total number of persons contacted this reporting period, number of instances of contact, active clients who became enrolled this reporting period, the total number of services provided during this reporting time period, the total number of referrals given during this reporting time period, number of people enrolled by sex, age, and ethnicity, Veterans, with co-occurring disorders, in emergency various types of housing, amount of federal PATH funds and state subsidies received during the reporting year, number of staff in the provider organizations, number of full-time equivalent (FTE) of staff supported by PATH and matching funds, type of provider organization.

**Indicate the categories of individuals about whom PII is collected, maintained or shared.**

Business Partner/Contacts (Federal/state/local agencies)

**How many individuals' PII is in the system?**

500-4,999

**For what primary purpose is the PII used?**

Name and Email Address are used to identify the provider who is submitting PATH data and to correspond with the user

**Describe the secondary uses for which the PII will be used.**

None

**Identify legal authorities governing information use and disclosure specific to the system and program.**

5 USC Section 301, Departmental regulations

**Are records on the system retrieved by one or more PII data elements?**

No

**Identify the sources of PII in the system.**

Government Sources

Within OpDiv

State/Local/Tribal

**Identify the OMB information collection approval number and expiration date**

OMB Control No. 0930-0205

PATH Annual Report

Expires 4/30/2026

**Is the PII shared with other organizations?**

No

**Describe the process in place to notify individuals that their personal information will be collected. If no prior notice is given, explain the reason.**

There is no method to opt out of the collection of PII as the only way access is granted is via user credentials (name and email address).

**Is the submission of PII by individuals voluntary or mandatory?**

Voluntary

**Describe the method for individuals to opt-out of the collection or use of their PII. If there is no option to object to the information collection, provide a reason.**

There is no method to opt out of the collection of PII as the only way access is granted is via user credentials (name and email address).

**Process to notify and obtain consent from individuals whose PII is in the system when major changes occur to the system.**

There are no major changes to the system where these personnel would need to have additional consent obtained. In the event of a disclosure, users would be emailed.

**Describe the process in place to resolve an individual's concerns when they believe their PII has been inappropriately obtained, used, or disclosed, or that the PII is inaccurate.**

All users have access to their own PII in the system for changes or updates. If someone does not want to be part of the program any longer and wants their PII removed, they may contact a member of the Program Staff. This contact information is provided on the site.

**Describe the process in place for periodic reviews of PII contained in the system to ensure the data's integrity, availability, accuracy and relevancy.**

Users have access to their own PII and are relied upon to keep the information up-to-date and accurate. User credentials are updated every 60 days to maintain integrity and accuracy. If a person does not want to be part of the program any longer, their information can be made inactive or fully removed from the system depending on their desire.

**Identify who will have access to the PII in the system and the reason why they require access.**

**Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.**

Access to data is based on the roles of users as authorized by the project manager. Granulated rights at both application and server levels will utilize a responsibilities/authorization matrix ranging from standard user to system administrators (full rights). Integrated system validation controls regulate access and checks will be put into place to monitor and enforce activation, expiration, renewal and deactivation of user accounts.

**Describe the methods in place to allow those with access to PII to only access the minimum amount of information necessary to perform their job.**

Job function determines the level of access, and users are assigned only those rights necessary to fulfill responsibilities for approved roles. System-level audit controls safeguard and audit use.

**Identify training and awareness provided to personnel (system owners, managers, operators, contractors and/or program managers) using the system to make them aware of their responsibilities for protecting the information being collected and maintained.**

Privacy and Security training is provided at on-boarding, and annual refresher training is provided and mandatory. A list is maintained and submitted to the Contracting Representative (COR) as requested

**Describe training system users receive (above and beyond general security and privacy awareness training).**

Additional training for data collection, the use of data in analyses, and other task-specific training is provided as needed.

**Do contracts include Federal Acquisition Regulation and other appropriate clauses ensuring adherence to privacy provisions and practices?**

Yes

**Describe the process and guidelines in place with regard to the retention and destruction of PII.**

PII collected as approved by contract will remain on secured server(s) until a request is made to move/remove/transition or destroy data. The specific National Archives and Records Administration (NARA) Records Control Schedule (RCS) Job Numbers or General Records Schedules (GRSs) that apply to the PII maintained in the system are DAA-GRS-2013-0005-0003, DAA-GRS-2013-0005-0002, and DAA-GRS-2013-0005-0008 . Daily backup of servers follow Advanced Encryption Standard (AES) controls and corporate controls regulate restore/upgrade operations as needed.

Per the contract, when information, data, documentary material, records and/or equipment is no longer required, it shall be returned to SAMHSA control or the Contractor must hold it until otherwise directed. Permanent electronic records shall be transferred to SAMHSA 60 days prior to period of performance expiration as prescribed in the Department of Defense (DoD) Standard 5015.2 electronic format regulation and NARA Bulletin 2014-04, Revised Format Guidance for the Transfer of Permanent Electronic Records.

**Describe, briefly but with specificity, how the PII will be secured in the system using administrative, technical, and physical controls.**

This system is classified as a Low Application and all personnel (staff and contractors) and processes comply with the NIST 800-53 controls required to operate.

**Identify the publicly-available URL:**

<https://pathpdx.samhsa.gov/>

<https://pathreports.samhsa.gov/>

Note: web address is a hyperlink.

**Does the website have a posted privacy notice?**

Yes

**Is the privacy policy available in a machine-readable format?**

Yes

**Does the website use web measurement and customization technology?**

No

**Does the website have any information or pages directed at children under the age of thirteen?**

No

**Does the website contain links to non- federal government websites external to HHS?**

No

**Is a disclaimer notice provided to users that follow external links to websites not owned or operated by HHS?**

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